UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

Caption in compliance with D.N.J. LBR 9004-1

FREEDMAN LAW, LLC

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Attorneys for Nancy Isaacson, Chapter 7

Trustee

In re:

Case No.: 15-22985 (JKS)

AKESIS, LLC,

Chapter 7

Debtor.

NOTICE OF MOTION FOR APPROVAL OF SETTLEMENT OF ALL CLAIMS BY TRUSTEE AGAINST TRIAL MANAGEMENT ASSOCIATES AND 3D CRO, LLC PURSUANT TO RULE 9019

PLEASE TAKE NOTICE that on July 26, 2016 at 10:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorneys for Nancy Isaacson, Chapter 7 Trustee (the "Trustee") for the estate of Akesis, LLC, shall apply to the Honorable John K. Sherwood, Bankruptcy Judge, at the United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey, 07102, pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure for entry of an order approving of the proposed settlement of all claims of the Trustee against Trial Management Associates and 3D CRO, LLC.

PLEASE TAKE FURTHER NOTICE that in support of the within Motion, the Trustee shall rely upon the Certification of Nancy Isaacson.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted with this

motion.

Dated: June 21, 2016

FREEDMAN LAW, LLC

<u>/s/ Terri Jane Freedman</u>

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